

GDPR – adviser FAQ

1. Who is your data protection officer or, if you do not have a data protection officer, who is the person responsible for GDPR compliance? Please provide their contact details so we can forward a full GDPR assessment questionnaire for completion.

Yvonne Clough, head of compliance is overall responsible for GDPR for Nucleus. All GDPR enquiries should be channelled through Yvonne at data.protection@nucleusfinancial.com.

2. What third party organisations do you work with that may also have access to the data we share with you?

- Genpact – third party administrator
- Bravura – technology provider
- Pallas – provide illustration engine
- Forth – print client statements
- JIRA – customer query system
- Microsoft Dynamics – customer relationship management
- Hubspot – marketing and communications
- MS Exchange – email
- Eventsforce – running events
- Learnupon – learning management system
- Various internal systems which can be discussed if required

3. Who in Nucleus has access to the client data we share with you for support issues?

Only teams directly involved in processing activities for example client relations managers and supporting functions such as sales and platform support.

4. Do you currently have ISO127001 accreditation? If not, do you intend to achieve this as part of the GDPR implementation project?

The Vodafone datacentre where the Nucleus platform is hosted is certified, our hosting partners Bravura who maintain the platform are aligned to the standard but not certified.

Nucleus does not intend to become certified as it is not proportional to the activities we directly perform. We are subject to internal and external auditing of our systems and controls.

5. FCA registration number (FRN)

456117.

6. Confirmation of UK entity status

- Registered with Companies House. Registered number: 05629686
- Registered with Information Commissioner's Office (ICO) – Z9643780 (NFG) Z9643794 (NFS)

7. Confirmation of PI cover to confirm you have sufficient cover in place

Nucleus has a principal PI insurance policy with a limit of £5m and excess layers of PI insurance with an additional £10m limit (i.e. £15m in total).

8. Can you provide details of any cyber security protection held?

Cyber insurance is in place with a limit of £10m.

9. Can I access a copy of the latest audited accounts?

These can be obtained from companies house.

10. Do you transfer data outside of the UK?

Yes, any transfer outside the UK will be documented in our privacy policy and disclosed in our privacy statement.

11. Do you consider your company to be a data controller or a data processor or both?

Both. For Nucleus wrappers we are the data controller, for the platform service we are data processor.

12. What data do you process for adviser firms?

We will process personal data of employees of financial adviser firms as well as clients of financial adviser firms.

13. Do you store the data in a manual filing system or an electronic system or both?

Both. While our primary means of operating is online, some elements require paper documents which, once completed, are scanned and archived.

GDPR – adviser FAQ

14. What data do you hold/collect?

We collect and hold data that is required to identify customers and manage accounts.

15. Do you have a documented retention policy?

Yes, a copy can be made available on request.

16. What are the reasons for holding data?

We hold client and adviser data for contractual reasons and in order to satisfy regulatory requirements and to provide our service.

17. Do you pass data to any company or organisation that is based outside the European Economic Area?

Yes, and we take appropriate steps to ensure the protection of personal data.

18. What measures are in place to keep personal data safe and secure?

- Information Security is approved at board level
- Mandating of regular staff training
- ISO certified Tier III Data Centre
- Regular security testing of systems
- Secure development processes
- Screening of all staff

19. Does your company produce an audited report of security measures?

We have both internal and external audits completed regularly. These are not published externally.

20. What is the timescale for you to inform my firm of any data security breaches?

In line with guidance from the ICO, we would inform any firm affected by a security breach as soon as we have sufficient information about the breach, and without undue delay.